

From: [POULSEN Mike](#)
To: [Eric Blischke/R10/USEPA/US@EPA](#)
Cc: [Chip Humphrey/R10/USEPA/US@EPA](#); [ANDERSON Jim M](#); [MCCLINCY Matt](#); [Dana Davoli/R10/USEPA/US@EPA](#)
Subject: RE: LWG Background Proposal
Date: 04/28/2008 01:58 PM

Eric -

I won't be at the meeting on Thursday, so I'll give you my thoughts now on LWG's background proposal.

II. c. Outliers. They applied best professional judgment, and did not identify any of the statistical outliers as actual outliers. I'm reluctant to accept this. But it is fair to have a discussion about this issue. For the evaluation of upstream PCB data for the Zidell site, I called out two PCB sediment outliers. We did not identify a source for the outliers, although proximity to Ross Island is a possibility.

II. d. ND value substitution. Looking at the EPA guidance, I guess it is OK to not use substitution if n-det < 6 or ND > 80%. It is not clear what they propose to do under these circumstances.

III. c. Hilltopping. Matt can take up the issue of appropriate values for replacement. It may be more appropriate to use baseline values rather than background values.

III. c. Cap Material Selection. It may not work to use the 95th UCL as the criterion for clean capping material. Depending on how it is applied, you could end up with false positives. They will probably want to compare distributions, as you would with most comparisons with background.

III. d. Baseline v. background. I'm not sure about using the "knee of the curve" approach to establishing baseline, although that is what we did for Columbia Slough. They may want to consider using upper prediction limits. As a practical matter, it may not be important, because you will likely still need to apply judgment to decide on AOPC boundaries.

- Mike

-----Original Message-----

From: Blischke.Eric@epamail.epa.gov
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Sent: Friday, April 25, 2008 12:16 PM
To: Shephard.Burt@epamail.epa.gov; Humphrey.Chip@epamail.epa.gov;
Cc: lbernardini@parametrix.com
Subject: Fw: LWG Background Proposal

For next Thursday's meeting.

Eric